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Subject: Disposal Screening
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Eric-

The Department of Environmental Quality (DEQ) reviewed the LWG's 6/19/09 *Screening of Disposal Facilities for the FS* for the Portland Harbor Site and has the following comments:

Page 6 The document suggests that nearly all of the sediment will not be a RCRA hazardous waste and therefore disposal at a Subtitle C landfill is unnecessary. This may be true, but note that during the Gasco "Tar Body" removal action, given the material management options available, NW Natural disposed of dredged material at a Subtitle C landfill (as non-hazardous) even though it was not considered a RCRA hazardous waste. It is possible that some highly-contaminated Portland Harbor sediment that is not RCRA hazardous waste may warrant the added protectiveness of a Subtitle C landfill.

Thanks-

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